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BACKGROUNDCHECKS.COM LLC
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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 Gwendolyn Washington,

12 Plaintiff,

13 v.

14 Trans Union LLC; Experian Information
Solutions, Inc.; Innovis Data Solutions, Inc.;
Clarity Services, Inc.; Backgroundchecks.com
15 LLC; Lending Club Bank, National Association
and Equiant Financial Services Inc.,

16 Defendants.
17

Case No. 2:24-cv-01591-JCM-EJY

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

18 Plaintiff GWENDOLYN WASHINGTON ("Plaintiff") and Defendant
19 BACKGROUNDCHECKS.COM LLC ("Defendant"), by and through their undersigned counsel,
20 hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from
21 the current deadline of October 29, 2024, up to and including **December 2, 2024**.

22 The requested extension is necessary in light of the fact the parties have begun discussions
23 regarding the scope and handling of the case and potential resolution of this matter. The additional
24 time will allow the parties to complete these discussions for efficiency before having to engage in
25 motion practice.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3
4 Dated: October 25, 2024

Dated: October 25, 2024

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Gerardo Avalos

George Haines, Esq.
Gerardo Avalos, Esq
FREEDOM LAW FIRM, LLC

/s/ Diana G. Dickinson

Diana G. Dickinson, Esq.
LITTLER MENDELSON, P.C.

9 *Attorneys for Plaintiff*
10 GWENDOLYN WASHINGTON

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 **IT IS SO ORDERED.**

12 Dated: October 25, 2024

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15 ELAYNA J. YOUCHAK
16 UNITED STATES MAGISTRATE JUDGE

17 4857-1424-0230.1 / 107811-1039